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October 28, 2024

## **VIA ECF**

Hon. Edgardo Ramos Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: *T.R.*, et al. v. N.Y.C. Dep't of Education, 22-cv-6373 (ER)(GS)

Dear Judge Ramos:

I am a Special Assistant Corporation Counsel in the Office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks *inter alia* attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. § 1400, *et seq.*, as well as for this action.

Defendant writes to respectfully request that November 1, 2024 initial conference be adjourned to December 2, 2024, or a time thereafter more convenient for the Court. This is the twelfth request to adjourn the conference. The first request was made on June 1, 2023 and granted by Your Honor the following day. The second request was made on Aug. 1, 2023 and granted by Your Honor on August 3, 2023. The third request was made on Oct. 6, 2023 and granted by Your Honor that day. The fourth request was made on Nov. 28, 2023 and granted by Your Honor on Nov. 30, 2023. The fifth request was made on Feb. 9, 2024 and granted by Your Honor that day. The sixth request was made on March 11, 2024 and granted by Your Honor on March 13, 2024. The seventh request was made on May 28, 2024 and granted by Your Honor that same day. The eighth request was made on July 31, 2024 and granted by Your Honor the following day. The penultimate request was made on Sept. 4, 2024 and granted by Your Honor the following day. The last request was made on September 30, 2024 and granted by Your Honor the following day.

The requested adjournment will permit the parties to continue settlement discussions. The parties are hopeful that they can settle this matter without further burden on the Court's time.

Accordingly, Defendant respectfully requests that the November 1, 2024 conference be adjourned to December 2, 2024. Thank you for considering this request.

Respectfully submitted,

/s/

Martha Nimmer, Esq.

Special Assistant Corporation Counsel

cc: Benjamin Kopp, Esq. (via ECF)

Defendant's request to adjourn the initial meeting from November 1, 2024, 10:30 am, to December 4, 2024, 4:30 pm, is granted.

SO ORDERED.

Edgardo Ramos, U.S.D.J. Dated: October 29, 2024

New York, New York